

Amanda Katzenstein, Esq. (VBN #82273)  
POLSINELLI LLP  
Three Embarcadero Center, Suite 1350  
San Francisco, CA 94111  
(415) 248-2100

*Counsel for certain Lender Trusts and their  
Special Servicer, KeyBank National Association*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**In re:** ) **Chapter 11**  
CIRCUIT CITY STORES, INC., *et al.*, ) Case No. 08-35653-KRH  
Debtors. ) Jointly Administered

**NOTICE OF INTENT TO ATTEND HEARINGS  
Docket Nos. 13955, 13959, and 13961**

The below listed Lender Trusts (*see Exhibit A*) will appear by and through their counsel, Robert J.E. Edwards, and will attend the hearings noticed herein as Docket Nos. 13955, 13959, and 13961. The Lender Trusts do not oppose the noticed relief sought by the Liquidating Trust in the hearings but will participate to the extent necessary to demonstrate as follows:

Dkt. No. 13955 (Claim No. 9721) – Lender Trust No. 2 was the secured lender for the landlord of the property at issue in Claim No. 9721. Pursuant to a Deed in Lieu Agreement between Lender Trust No. 2 and landlord, landlord assigned all rights it may have had to any claims concerning the property at issue to Lender Trust No. 2.

Dkt. No. 13956 (Claim No. 9724) – Lender Trust No. 2 was the secured lender for the landlord of the property at issue in Claim No. 9724. Lender Trust No. 2 has since foreclosed on the property at issue. Pursuant to the loan documents between Lender Trust No. 2 and landlord, landlord is the proper holder of the claim concerning the property at issue.

Dkt. No. 13961 (Claim No. 15019) – Lender Trust No. 3 was the secured lender for the landlord of the property at issue in Claim No. 15019. Pursuant to a Settlement Agreement between Lender Trust No. 2 and landlord, landlord assigned all rights it may have had to any claims concerning the property at issue to Lender Trust No. 3.

Dated: December 9, 2016

Respectfully submitted,

POLSINELLI LLP

By: /s/ Amanda Katzenstein  
AMANDA KATZENSTEIN (VBN #82273)  
Three Embarcadero Center, Suite 1350  
San Francisco, CA 94111  
(415) 248-2100  
Fax No. (415) 248-2101  
[akatzenstein@polsinelli.com](mailto:akatzenstein@polsinelli.com)

POLSINELLI PC

ANDREW J. NAZAR (admitted *pro hac vice*)  
ROBERT J.E. EDWARDS (*pro hac* pending)  
900 West 48<sup>th</sup> Place, Suite 900  
Kansas City, Missouri 64112  
(816) 753-1000  
Fax No. (816) 753-1536  
[anazar@polsinelli.com](mailto:anazar@polsinelli.com)  
[redwards@polsinelli.com](mailto:redwards@polsinelli.com)

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 9<sup>th</sup> day of December 2016, a true and correct copy of the foregoing *Motion for Admission Pro Hac Vice* was filed using the Court's CM/ECF system that sent notice of such filing to counsel for the Debtors, Liquidating Trust, U.S. Trustee, and all interested parties by ECF notification from the Court

/s/ Amanda Katzenstein

**Exhibit A**

**LENDER TRUSTS**

1. U.S. Bank National Association, as trustee for the registered holders of GMAC Commercial Mortgage Securities, Inc., Mortgage Pass-Through Certificates, Series 1997-C1.
2. U.S. Bank National Association, as trustee for the registered holders of GMAC Commercial Mortgage Securities, Inc., Mortgage Pass-Through Certificates, Series 1998-C2.
3. Wells Fargo Bank, N.A., successor by merger to Wells Fargo Bank Minnesota, N.A. f/k/a Norwest Bank Minnesota, N.A. as trustee for the registered holders of Merrill Lynch Mortgage Investors, Inc., Mortgage Pass-Through Certificates, Series 1998-C1-CLT.